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**CLOSURE PLAN
U.S. DOE FERNALD
OH6 890 008 976**

05/24/91

**OEPA/DOE-FMPC
6
LETTER**



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

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George V. Voinovich
Governor

CERTIFIED MAIL

NOTICE OF DEFICIENCY

May 24, 1991

Mr. Gerald Westerbeck
U.S. DOE Feed Materials Production Center
7400 Willey Road
Fernald, Ohio 45030

RE: CLOSURE PLAN
U.S. DOE Feed Materials Production Center
OH6 890 008 976

Dear Mr. Westerbeck:

On November 5, 1990, Ohio EPA received from U.S. DOE Feed Materials Production Center a closure plan for a hazardous waste underground storage tank located at 7400 Willey Road, Fernald, Ohio.

This closure plan was submitted pursuant to Rule 3745-66-12 of the Ohio Administrative Code (OAC) in order to demonstrate that the U.S. DOE Feed Materials Production Center proposal for closure complies with the requirements of OAC Rules 3745-66-11 and 3745-66-12.

The public was given the opportunity to submit written comments regarding the closure plan in accordance with OAC Rules 3745-66-12. The public comment period extended from November 19, 1990 through December 26, 1990. No public comments were received by Ohio EPA.

Pursuant to OAC 3745-66-12(D)(4), I am providing you with a statement of deficiencies in the plan, outlined in Attachment A.

Please take notice that OAC Rule 3745-66-12 requires that a modified closure plan addressing the deficiencies enumerated in Attachment A be submitted to the Director of the Ohio EPA for approval within thirty (30) days of the receipt of this letter.

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Mr. Westerbeck
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The modified closure plan shall be in accordance with the following editorial protocol or convention:

1. Old language is over-struck, but not obliterated.
2. New language is capitalized.
3. Page headers should indicate date of submission.
4. If significant changes are necessary, pages should be re-numbered, table of contents revised, and complete sections provided as required.

The modified closure plan should be submitted to: Ohio Environmental Protection Agency, Division of Solid and Hazardous Waste Management, Attn: Thomas Crepeau, Manager, Data Management Section, P.O. Box 1049, Columbus, Ohio 43266-0149. A copy should also be sent to: Paul Pardi, Ohio EPA, Southwest District Office, 40 South Main Street, Dayton, Ohio 45402.

Upon review of the resubmitted plan, I will prepare and issue either a draft or a final action approving or modifying such plan. If you wish to arrange a meeting to discuss your responses to this Notice of Deficiency, please contact Paul Vandermeer, Ohio EPA, DSHWM, Central Office (614) 644-2956 or Paul Pardi at (513) 285-6357.

Sincerely,



Donald R. Schregardus
Director

DRS/PV/pas

cc: Tom Crepeau, DSHWM, Central File, Ohio EPA
Lisa Pierard, USEPA, Region V
Joel Morbito, USEPA, Region V
Paul Pardi, SWDO, Ohio EPA
Paul Vandermeer, CO, Ohio EPA
Graham Mitchell, Ohio EPA, SWDO
Phil Harris, Ohio EPA, SWDO
Mike Hayes, Ohio EPA, SWDO

Attachment A1. **Section 2.1. Waste Management Unit Description.**

USDOE Feed Materials Production Center (DOE-FMPC) shall revise the closure plan to correct the description of the waste management tank system. The current closure plan describes the hazardous waste management portion of the tank system to include only the flowline from the separator to the tank, the tank itself, the purge line, and the vent from the tank. Figure 5 shows the floor drains and the oil/water separator as part of the overall flow process. OAC 3745-66-97(A) requires the owner/operator to decontaminate or remove all waste residues and **structures and equipment** contaminated with hazardous waste constituents. Latter sections of the closure plan also indicate that the floor drains and oil/water separator will be decontaminated. DOE-FMPC shall include the floor drains and oil/water separator in the description of the hazardous waste tank system.

2. **Section 2.1. Waste Management Unit Description.**

DOE-FMPC makes the statement that "If it is determined the FMPC solvent usage satisfies the limits in OAC 3745-51-03(B)(2)(e)..., the wastewater is exempt." The citation mentioned in this statement is non-existent. DOE-FMPC shall justify and explain this reference.

3. **Section 3.1. Closure Objectives.**

See Comment No. 1 above.

4. **Section 3.2. Closure Methodology, Bullet 4.**

DOE-FMPC mentions that soil samples taken from the tank excavation will be analyzed to "identify any contaminants of concern." DOE-FMPC shall revise the closure plan to include soil analysis for the constituents listed in Table 1 (pp. 20-21) of the closure plan.

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5. **Section 3.2. Closure Methodology, Bullet 5.**

DOE-FMPC mentions the use of deionized water for rinsing of the tank and piping. The decontamination effort was noted to occur as follows:

Pressure washing followed by a rinse with deionized water (repeated 3 times) with analysis of the final rinses in a composite sample.

This procedure will serve to create a great deal of additional cleaning which may not be necessary. Ohio EPA recommends that the tank and associated equipment be washed with the detergents and then rinsed with tap water (deionized is not necessary) after all washing has been completed. Upon completion of the third rinse, the rinse sample may be taken to confirm clean. The third rinse should not be composited with the first two rinses as these may still show contamination and therefore give evidence that another cleaning is necessary when the third rinse actually showed clean.

Additionally, if the tank and associated equipment are cleaned to the appropriate standards, then they do not have to be placed in a hazardous waste storage area, but may be managed as scrap or disposed as solid waste (barring any detection of radioactivity).

6. **Section 3.5, Appendix A/Section 9.0. Health and Safety.**

DOE-FMPC shall revise the closure plan to include the site specific health and safety plan for the closure of the tank system.

7. **Sections 4.1.2 and 4.1.3. Standard of Clean for... Rinseate.**

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The rinseate clean standards proposed by DOE-FMPC are slightly more stringent than current clean criteria used by Ohio EPA. DOE-FMPC shall revise the closure plan to use the following rinseate clean standards:

The tank and equipment shall be considered clean when concentrations of hazardous waste constituents fall below fifteen (15) times the maximum contaminant level (MCL) or 1 mg/l, whichever is less. If an MCL is unavailable, then fifteen (15) times the maximum contaminant level goal (MCLG) or 1 mg/l (whichever is less) shall be used as the clean standard. If the MCLG is zero, then the clean standard shall be fifteen times the contaminant's analytical detection limit (using SW-846 methods) or 1 mg/l, whichever is less. If neither an MCL nor an MCLG exist, then the clean standard is 1 mg/l.

8. Section 4.2. Certification Inspections.

DOE-FMPC shall revise the closure plan to include the exact times when the qualified, independent, registered, professional engineer will be present to oversee critical closure activities. This shall also be indicated in the closure schedule found in Table 2.

9. Section 4.4. Statement of Certification.

The owner/operator's and qualified, independent, registered professional engineer's certifications of closure shall follow the signature requirements found in OAC 3745-50-42. Additionally, the owner/operator certification of closure must follow the exact wording found in OAC 3745-50-42(D) and the engineer must be registered in the State of Ohio. DOE-FMPC shall revise the closure plan to reflect these requirements.

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10. **Appendix A/Section 3.3.3. Background Soil Samples.**

DOE-FMPC shall revise the closure plan to include the locations of the background sampling points as these were not specified in the current plan. This shall include a map relating sample locations to other units or structures on site.